



March 25, 2025

Dear Secretary-General Arsenio Dominguez,

We are now entering a crucial year for the International Maritime Organization (IMO) to initiate shipping's clean fuel and energy transition through the adoption of effective policy. As President and CEO of the Zero Emission Maritime Buyers Alliance (ZEMBA), I would like to take this opportunity to share key insights relevant to the IMO's discussions at this pivotal moment and encourage the IMO to take action to approve a clear, comprehensive, globally consistent set of measures in April.

The shipping sector is currently responsible for nearly 3% of global greenhouse gas (GHG) emissions. The IMO's future projections suggest that under business-as-usual scenarios, emissions could increase to 90-130% of 2008 emissions by 2050.¹ Yet, the journey to a clean energy future for shipping is not just a necessity for companies and nations seeking to be responsible stewards of our shared planet—it is also an opportunity to unlock new economic potential around the world and ensure the resilience of supply chains for generations to come.

In 2023, the IMO created a roadmap for the industry's transition that set an end goal of net-zero GHG emissions by or around 2050 and included key checkpoints for the journey: at least a 20% GHG emissions reduction, striving for 30%, by 2030, and at least a 70% GHG emissions reduction, striving for 80%, by 2040 compared to a 2008 GHG emissions baseline. Since then, the sector has awaited adoption of the mid-term measures, the key to actualizing these ambitions. Given shipping's essential role in global trade and private sector actors ready to invest in innovative fuels and technologies under the right conditions, it is critical the IMO succeeds in delivering much-needed regulatory clarity and incentivizes the most scalable, long-term solutions.

As the IMO developed its revised GHG strategy, freight buyers who rely on maritime shipping embarked on their own first-mover initiative. ZEMBA was launched as a first-of-its-kind buyers group in March 2023 to accelerate the market for long-term solutions necessary to achieve maritime shipping's clean energy future. In a little over a year, ZEMBA announced and awarded its inaugural collective tender, which is expected to avoid at least 82,000 metric tonnes of carbon dioxide equivalent (CO₂e) emissions in 2025 and 2026 through deployment of waste-based, third-party certified maritime biomethane sourced from landfill gas and livestock manure.

ZEMBA's inaugural tender drew inspiration from the 'striving for' targets of the IMO 2023 GHG strategy, along with the draft guidelines on the Life Cycle GHG Intensity of Marine Fuels (LCA Guidelines). The transport work that results from this first deal is expected to achieve a well-to-wake (WtW) CO₂e emissions reduction greater than 90% on a life cycle basis. The details of this tender and real-world insights gained from this effort were included in an information paper submitted to the 82nd session of the Marine Environment Protection Committee (MEPC 82/INF.13).

¹ [IMO \(2025\) Climate Action](#). Accessed March 24, 2025.

Since that time, ZEMBA membership has grown to over 40 multinational freight buyers who have come together to issue a second tender for at least 80 billion tonne-nautical miles of ocean shipping powered by e-fuels. As announced on February 25, 2025, ZEMBA Eligible Fuels for its second tender are defined as those produced with clean energy, using only third-party certified, sustainable, waste sources of carbon (where carbon is necessary). Bidders must achieve at least a 90% life cycle emissions reduction for primary propulsion on the basis of transport work. By collaborating and making advanced offtake commitments for innovative fuels and technologies, ZEMBA has rapidly kickstarted the market and sent important demand signals for the most sustainable, scalable, and economically viable solutions for the maritime sector. Our private sector partners are moving quickly to match the urgency of the moment, and we encourage the IMO to act with deliberate speed and ambition as well.

As global employers and customers of the shipping industry, freight buyers have a significant stake in the sector's energy transition and the decisions that the IMO will make this year. Through their participation in ZEMBA, freight buyers are actively demonstrating their commitment to accelerating investment in long-term, scalable solutions. While voluntary private sector action is essential to create new markets and set the sector on the right course, it cannot achieve the mission alone. A predictable regulatory environment that provides a level playing field and supports innovation is essential. This is not only a challenge to confront, but also an opportunity to seize as the maritime sector—and the global economy that relies on it—moves into a new era.

With this in mind, and drawing on the experience gained from ZEMBA, it is critical that the IMO—through its Member States—reach consensus on the following:

- 1. Align the mid-term measures with the 'striving for' trajectories laid out in the 2023 GHG Strategy.** The 'striving for' pathway brings forward the business case and potential economic benefits of adopting long-term solutions sooner and keeps shipping close to a 1.5°C alignment.² Any other course of action would diverge from science, set the sector adrift at the start of its transition, and risk inefficiency, disruption, and unexpected costs in later regulatory course corrections.
- 2. The GHG fuel standard must apply a full life cycle (e.g., WtW) scope.** Complete and robust life cycle assessment guidelines should be adopted and reviewed periodically, with key components (default and actual emissions factors) updated according to the best available science. Any approach to diminish the WtW assessment of marine fuels and technologies masks their full environmental impact, potential costs, and could lead to excess GHG emissions. Furthermore, for the many freight buyers who use life cycle supply chain emissions to evaluate their own performance, consistency in measurement approaches is essential. For these reasons, ZEMBA applies a WtW requirement in its tenders, finds this readily achievable, and urges the IMO to do the same for the forthcoming measures.

² Bullock, Mason & Larkin (2023): 'Are the IMO's new targets for international shipping compatible with the Paris Climate Agreement?' Climate Policy 24:7, 963-968, DOI: 10.1080/14693062.2023.2293081.

- 3. Design the mid-term measures with adequate financial incentives to foster a viable market for long-term scalable fuels and technologies essential to shipping's transition.** Miscalibration of the financial rewards for fuels and technologies risks locking the sector into unsustainable short-term options, undermining market confidence, and increasing the cost of the transition overall. Now is our best opportunity to set the sector on course to rapid adoption of low-emission fuels and technologies that can benefit from cost reductions with scale, achieve long-term economic viability, and enable us to achieve our collective sustainability goals.
- 4. Develop a transparent, robust fuel certification framework that recognizes established and credible schemes and is cohesively aligned with the LCA Guidelines.** Reliable fuel certification is critical for market confidence by assuring stakeholders, including fuel producers and shipping companies, that the fuels they use, or supply, are compliant with regulations and freight buyer expectations. Criteria to recognize established and credible fuel certification schemes should be adopted in the regulatory framework, and the IMO should ensure implementation guidelines reflect best available science and include plans for regular review to adapt to evolving industry needs. Using established and widely adopted fuel certification schemes wherever possible also creates clarity and efficiency across the maritime value chain and numerous sectors of the global economy that will increasingly rely on such fuels.
- 5. The IMO Data Collection System must be updated to support transparent and effective reporting under the mid-term measures.** Safeguards should be adopted to prevent errors and non-reporting, alongside the establishment of a formal data verification process. Transparency and accessibility must improve, enabling all stakeholders, including freight buyers, access to credible maritime emissions data. Data reporting from this sector will be essential for assessment of regulatory compliance and understanding the sector's progress, but opaque and flawed reporting could significantly undermine the trust of key maritime stakeholders if IMO data are not viewed as reliable or accessible to parties that need this information to make informed decisions.

As this critical work continues, I encourage the IMO to take action with deliberate speed on these points before the organization approves the package of measures in April 2025 and adopts them in October 2025. Working together, we look forward to embarking on a new era of shipping that is more sustainable, innovative, transparent, and that is ready to serve the global economy of the future.

Yours sincerely,



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About ZEMBA: To learn more about ZEMBA and its work, visit: www.shipzemba.org